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Eastern District of Pennsylvani

Bankruptcy No. 21-11560 Chapter 13

In re: SIERRA L MCMONAGLE

Debtor

RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Debtor Sierra L. McMonagle responds to the creditor's motion as follows:

Counsel for the parties have agreed to file a stipulation for an agreed order allowing the debtor to pay all post-petition arrearages in April 2024. The stipulation is being prepared by movant's counsel and it will be submitted for the court's approval.

Dated: March 6, 2024

/s/ Richard N. Lipow RICHARD N LIPOW Attorney for Debtor

Certificate of Service

The undersigned certifies that the foregoing was served by the ECF system on movant's counsel, the US and Chapter 13 trustees at the time it was filed.

Dated: March 6, 2024

/s/ Richard N. Lipow RICHARD N LIPOW Attorney for Debtor